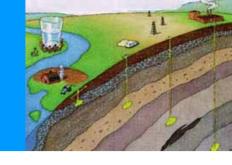
EPA Efforts: Carbon Capture and Storage

International Symposium on Site Characterization Lawrence Berkeley Lab, California March 20-22, 2006

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Geologic Sequestration Workgroup Co-Chair

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Overview



- Background and principles of EPA's Underground Injection Control Program
- EPA participation at third party conferences and development of its own initiatives, including a Geologic Sequestration Workgroup
- Potential gaps in research, practical questions, and timing considerations to facilitate potential EPA regulatory actions or guidance for permitting wells



UIC Program General Overview

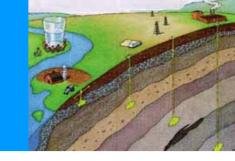
- SDWA requires EPA to develop minimum federal regulations for state and tribal Underground Injection Control (UIC) Programs to protect underground sources of drinking water
- USDW are defined as aquifers or portions of aquifers that:
 - have sufficient quantity of ground water to supply a public water system and
 - contain fewer than 10,000 mg/l or ppm total dissolved solids
- Underground Source of Drinking Water Include: Drinkable Quality Water (<3,000 TDS)

 And
 Useable Quality Water (3,000-10,000 TDS)

 Brine Salt Water (>10,000 TDS)
- 33 states have primary enforcement authority (primacy); EPA directly implements the program in 10 states; 7 split programs
- Primacy States can be more stringent than the minimum federal regulations
- KEY CONCEPT: SDWA provides EPA and States with flexibility to establish effective Class II oil and gas programs (Section 1425)



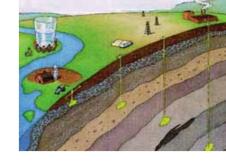
UIC Program: More Key Concepts



- Safe Drinking Water Act (SDWA)
 - UIC Program regulates underground injection of ALL <u>fluids</u> – liquid, gas, or slurry
 - Program covers injection of wastes <u>and</u>
 commodities (e.g. liquid hydrocarbons, water)
 - Only federal exemptions for natural gas storage and specific hydraulic fracturing
 - Therefore, EPA believes that the UIC program provides existing framework for CCS technologies



UIC WELL CLASSES



Class I Class III Class III



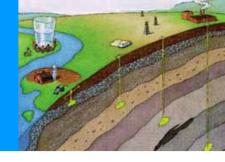
Class V







Regulatory Framework



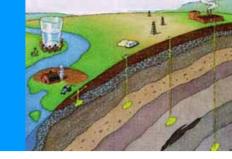
"With appropriate site selection..., a monitoring program..., a regulatory system, and the appropriate use of remediation methods..., the local health, safety and environmental risks of geological storage would be comparable to risks of current activities..."

-Summary for Policymakers, IPCC Special Report on CCS



Underground Injection Control (UIC) Program OR ID WY NE IN OH NO NO NC NC AR TN SC State Program AZ NM OK AR TN SC State Program FL Puerto Rico Virgin Islands American Samoa Indian Tribes

Cooperative Efforts

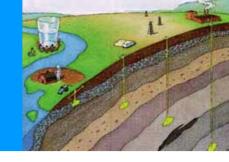


EPA has been active in various forums:

- International Efforts
 - Carbon Sequestration Leadership Forum (CSLF)
 - Intergovernmental Panel on Climate Change (IPCC)
 - London Convention and London Protocol
- Federal Efforts
 - Working with DOE Labs (NETL, LBNL)
 - GHG Inventory and Accounting
 - Conferences and Workshops
- State Efforts
 - EPA Regional/State Meetings
 - Ground Water Protection Council (GWPC)



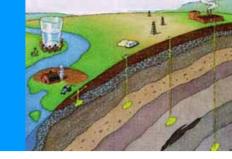
EPA Efforts: Geologic Sequestration Workgroup

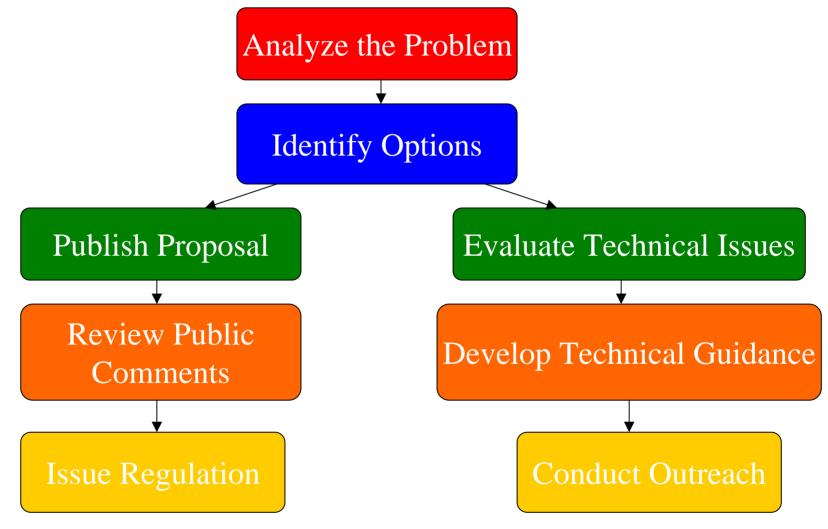


- Collaborative efforts on CCS started by EPA Office of Air and Radiation (OAR) and Office of Water in early 2004
- Internal EPA Geologic Sequestration
 Workgroup formed including 30 members
 from HQ Offices, EPA Regions and Labs
 (August 2004)
- Initial focus on technical and regulatory issues, risk assessment, communication and outreach



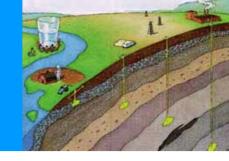
Role of an EPA Workgroup







EPA Regulatory Development Goals



- Protect human health and the environment
- Ensure that decisions are cost-effective and fully protective
- Conduct high quality scientific, economic, and policy analyses at early stages so that decision makers are well informed
- Apply new and improved methods to protect the environment
 - build flexibility into regulations from the very beginning
 - create strong partnerships with the regulated community vigorously engaging in public outreach and involvement
 - use effective non-regulatory approaches



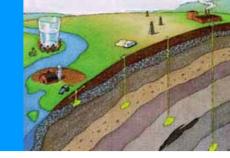
Key Technical Issues



- Site characterization for CO2 injection well projects including geology, geochemistry, and geohydrology
- "Area of Review" to determine locations of abandoned wells or other conduits for leakage
- Well construction and plugging and abandonment procedures for well closure
- Predicting fate of CO₂ (modeling and analytical tools)
- Monitoring and verification



EPA Efforts: Technical Workshops



- Geologic Modeling and Reservoir Simulation
 - April 6-7, 2005 in Houston, TX
 - Assess modeling capabilities for site characterization, risk assessment, and simulating long-term storage
- IPCC Inventory Guidelines & US GHG Inventory Methods
 - March 9, 2005 in Washington, DC (IPCC Guidelines)
 - September 27, 2005 in Portland, OR (EOR/US Inventory)
 - Encourage active participation and expert input in development of IPCC Guidelines and improving US Inventory
- Risk Assessment & Management
 - September 28-29, 2005 in Portland, OR
 - Share information and solicit expert input from a wide range of stakeholders including researchers, industry, NGOs, and regulators.



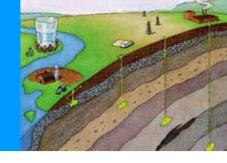
EPA Workshop Findings



- Strong participation in our workshops, and good suggestions for further research
- Areas include additional risk assessment and site characterization for permitting
- This symposium will further inform EPA's efforts related to well siting
- There are several other "gaps" EPA may explore including modeling of CO2 behavior in the subsurface, leakage scenarios, and potential health effects from large scale CO2 release



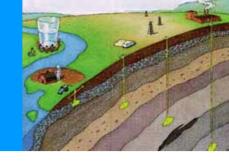
EPA Future Regulatory Role



- All regulatory agencies have an important role to play in building public confidence that CCS can be implemented safely and effectively
- But as the findings from the workshops indicate some uncertainties with respect to the potential risks of CCS and monitoring technologies still may exist
- However, we have a regulatory framework and years of technical experience with underground injection
- Our goal is to utilize that expertise, focus on near-term implementation issues, and collaborate with DOE, states, industry, and academia to ensure success



Regulatory Next Steps



- Building on Frio, Mountaineer, and other R&D project experience, EPA will pursue development of a Class V experimental technology guidance for CO2 injection
- This will be fleshed out by the GS WG, sent to EPA management, and then to DOE and the states for comments before being finalized sometime in 2006
- Although this will address the short-term DOE CCS pilot projects, EPA will still need information acquired from these pilots to inform any regulatory approach for the longterm commercial projects anticipated by 2012

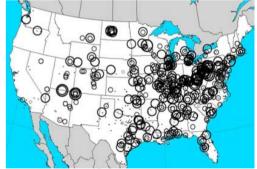


Scope of CCS UIC Program

- The potential deployment of CCS technologies could be massive and the potential implementation of CCS in the US could entail:
 - 1,000s of power plants and industrial facilities capturing CO₂, 24-7-365.
 - 100s to 1000s of communities living nearby CO₂ capture and/or storage facilities.
 - 10,000s of injection wells.
 - 1,000s of miles of dedicated CO₂ pipelines.
 - 100s of millions of tons of CO₂ being injected into the subsurface annually.
- Policies to allow the US to "grow its way out" of the nation's CO₂ emissions are likely inconsistent with stabilization at lower levels.
- The nation will therefore need a broad and robust portfolio of carbon management options as there truly is no "silver bullet" (injection wells).







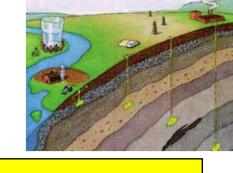




EPA's Reason to Stay Involved:

Protect Public Health

- Nature of some injected fluids may pose a risk to ground water quality and public health if managed improperly.
- Deep Class I and Class II wells must be properly sited, operated and constructed to avoid contaminating USDWs.

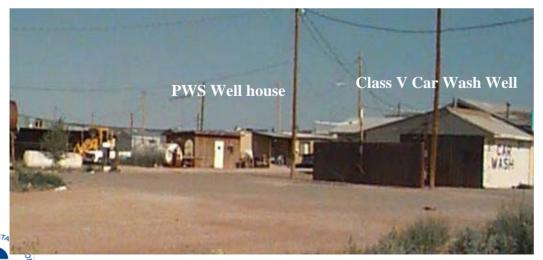


Class V Wells:

Are numerous & may be in close proximity to PWS or private wells;

Inject a wide range of fluids;

Inventory, location & injectate data is incomplete.





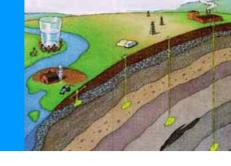
Summary



- U.S. is uniquely positioned to support global efforts to facilitate deployment of CCS
 - DOE R&D and Regional Sequestration Programs continue to provide data through demonstration projects
 - EPA's UIC program provides an existing framework and demonstrates safe underground injection of a variety of fluids
- EPA is currently evaluating technical and regulatory issues along with accounting approaches for national inventories
- EPA has identified practical questions with respect to site characterization and monitoring, and is evaluating the need, timing, and data requirements for regulatory development



Final Thoughts



- EPA shares your enthusiasm for CCS technologies which could address harmful climate change
- All Groups the international community, states, industry, academics can provide positive contributions to CCS efforts
- Participation by, and outreach to the public, in all arenas, will be *critical* to the success of CCS
- USEPA will continue to be an active participant

